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ABSTRACT

The report identifies key administrative issues at the Federal/State/local level which need to be addressed before new Federal career education legislation can be Proposed. The paper is divided into two parts: (1) issues on the Federal level that will be important to policymakers, administrators, and educators; and (2) important issues that must be resolved at the State and local level. The first section discusses the categorical/leadership role of the Federal government in implementing career education programs, structural issues of the Office of Career Education, program delivery (preliminary considerations and policy recommendations), and Federal funding arrangements (categorical vs. block grants, formula vs. project grants, demonstration and exemplary projects, and set-asides). The second section covers alternative State roles in administration, the need for establishing a State career education agency and a statewide director of career education, the necessity for State planning and evaluation activities, issues of eligibility and distribution of funds, and leadership at the local level. A bibliography is included. (EA)

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THE IMPLEMENTATION AND ADMINISTRATION OF A FEDERAL CAREER EDUCATION PROGRAM

by

Terry W. Hartle

prepared for

NATIONAL ADVISORY COUNCIL ON CAREER EDUCATION

September 1975

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U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
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TABLE OF CONTENTS

	PAGE
TABLE OF CONTENTS	i
INTRODUCTION	1
PART I: FEDERAL ISSUES	1
Federal Aid to Education	1
Federal Administration: Structural Issues	3
Program Delivery: Some Preliminary Considerations	5
Program Delivery: Policy Recommendations	9
Federal Funding Arrangements	10
Categorical vs. Block Grants	11
Formula vs. Project Grants	12
Set-Asides	13
PART II: STATE AND LOCAL ISSUES	14
Alternative State Roles in Administration	14
State Career Education Agency	16
Statewide Director of Career Education	17
The Value of Planning and Evaluation	17
Characteristics of Planning and Evaluation Activities	19
Determining Eligibility to Receive Funds	20
Leadership at the Local Level	21
SUMMARY	22

Introduction

In recent years, it has become increasingly clear that policy-making does not end when legislation is signed into law but continues throughout the process of implementing the new law. Implementation is not a sterile process that can be described in linear terms, from point A to point X. It is a process in which persons interact within a semi-structured environment in an effort to have an impact on the final shape of a particular program or policy. Rationality is not the most notable feature of program implementation, but there are enough regularities (custom, normative, and procedural) to permit those involved to play by the rules. In short, program implementation is a political process with substantial implications for the final appearance of a program or policy.

Although significant effort has gone into the development of experimental career education programs, little work has been devoted to the administrative issues that would accompany a major federal program. This paper is divided into two parts. Part I addresses some of the issues on the federal level that will be important to policymakers, administrators, and educators. Part II identifies in brief some of the most important issues that must be resolved at the state and local level.

PART I: FEDERAL ISSUES

Federal Aid to Education

In recent years, the barriers that have traditionally divided programs and responsibilities between federal, state, and local levels have been broken down. Rather than thinking of our federal system in terms of a layer cake, as we once did, we now employ Martin Grodzin's marble cake analogy to emphasize the complex and interwoven lines of responsibility

that characterize American government today.

With this weakening of the traditional boundaries on governmental activity, the restriction on federal aid to education has, to some degree, been broken. The conflicts surrounding church-state, and local control of education that blocked federal legislation for years have receded. In their place a consensus has emerged that John Matthews (30) described as follows:

> Education is no panacea for poverty, the lack of job skills or the disaffection of youth. The Federal Government, however, has a role in helping local school districts cope with special national problems like children from low income families, Indian children, or those with language problems or disabilities.

In the last 20 years, federal aid to education has grown significantly, especially in the case of higher postsecondary education where the federal contribution is now in excess of $8.1 billion, or 27 percent of the total income (32). In the case of elementary and secondary education, federal aid is $4.1 billion, or about eight percent of the total (21).

Despite the efforts of education groups, federal aid to education has been categorical; general aid to education is a dream not yet realized. This is not to say that federal funds have not had considerable impact. In the words of one scholar (2):

> ...while the percentage of federal educational support has not been impressive, the aid has exerted considerable programmatic or financial leverage in national policy.

Thus, a federal role in career education would most likely be categorical in nature - getting the money out to states and local education agencies for them to disburse in meeting career education objectives.

This is not to imply that the federal role be limited to signing checks. What is needed is a parternership arrangement with the federal government providing leadership as well as money to implement career education programs. Under such a program, state and local education agencies would have to be involved in planning the programs and kept advised of federal career education activities; they would have to train educators and administrators involved in career education and participate in program evaluation on a post-hoc basis. Throughout all this, the federal government would have to carry out its role in a manner that would encourage state and local participation.

Federal Administration: Structural Issues

An important question in evaluating the federal machinery for dealing with career education is the optimum location for an Office of Career Education. Initially career education activities were handled through the Bureau of Occupational and Adult Education. The Education Amendments of 1974 (PL 93-380) created a separate Office of Career Education reporting directly to the Commissioner of Education. This move gave the office increased public visibility and eliminated any danger that career education might, as one observer put it, "get lost in the bowels of the bureaucracy." Moreover, the change made it easier for the Office of Career Education to cut across organizational lines, an essential requirement if career education is to be successful. It might also be argued that the move helped dramatize the idea of career education as a philosophy of education rather than just a program. On the other hand, taking career education out of Bureau of Occupational and Adult Education diminished the financial and

administrative resources available to it*, separated the concept from two of its essential components, and created another small pocket within the bureaucracy. And while the creation of a new office provides some organizational benefits, they tend to be temporary. Pressman and Wildavsky (35) have suggested:

> The advantages of being new are exactly that: being new. They dissipate quickly over time. The organization ages rapidly. Little by little the regulations that apply to everyone else apply also to it. Accommodations are made with the other organizations in its environment. Territory is divided, divisions of labor are established, favors are traded, agreements are reached. All this means that the new organization now has settled into patterns of its own which it defends against interruption. Youth has gone and middle age has come, hopefully more powerful, certainly more experiences, inevitably less innovative.

Although the newness will wear off, having a separate Office of Career Education is essential. Besides the prestige and greater public visibility, mentioned earlier, keeping the office within the Commissioner's domain will prevent the negative impact on morale that results from frequent organizational changes. In light of these and other previously mentioned benefits, this paper recommends leaving the Office of Career Education where it is.

Although the Office of Career Education currently operates with a skeleton staff, any new career education initiative will require increased staff. Increasing the level of federal career education activities without providing adequate staff to handle the increased workload would be foolhardy.

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*For example, the Office of Career Education now has nine full-time professionals while the Bureau of Occupational and Adult Education has approximately one hundred.

Finally, no matter how the federal government is organized or reorganized, virtually all social programs cut across the jurisdictions of different bureaus, departments, and agencies. This is especially true of a program with as wide a focus as career education. Thus, a career education program will most likely have to be fitted into the arrangements that have been made with other programs in mind. Careful coordination with other executive agencies will be essential to help alleviate the problem of extensive clearance.

Program Delivery: Some Preliminary Considerations

After the primary organizational issues have been dealt with, attention must be directed to the most effective means of assuring state and local participation in the program. Common sense and the literature of program delivery suggest that simplicity in policies is much to be desired. The fewer steps involved in carrying out the program, the fewer opportunities for problems to overtake it. The more directly the program aims at its target, and the fewer the number of decisions involved in its ultimate realization, the greater likelihood that the program will be successfully implemented.

Federal assistance to states and local governments, private organizations, and individuals has grown rapidly throughout the 1960s and early 1970s. In 1960, federal grants to individuals and state and local governments accounted for 29.8 percent of the federal budget, in 1976 it is estimated that grants-in-aid will compose 54.6 of the federal budget outlays (4).

Obviously such a proliferation has contributed to a stress on the administrative structures at all levels of government. This problem has implications for state and local governments as well as the federal government. A recent General Accounting Office study (12) concluded that state and local governments are having substantial problems identifying, obtaining, and using federal funds. The report suggested "fundamental changes" in the way federal funds are distributed to state and local levels and encouraged Congress to reduce the complexity of the current system by consolidating programs and organizing them so those with similar goals are within the same agency*.

In 1971, the Commission on Government Procurement (5) succinctly described the effect of federal grant policies:

> Federal grant-type activities are a vast and complex collection of assistance programs, functioning with little central guidance in a variety of ways that are often inconsistent even for similar programs or projects. This situation generates frustration, uncertainty, overlap, ineffectiveness and waste.

Although few studies are available on the operational aspects of federal assistance, those that do exist suggest the following conclusions (33):

- The increase of the dollar volume and purposes of assistance programs in recent years has often overloaded administering agencies, leaving the administrators of programs little time to consider what assistance methods might contribute to the achievement of the ends desired. Organized ways of learning of the kinds of practices that might achieve the results desired are generally lacking.

- Conscious administrative experimentation has been lacking. There often is little understanding of what particular inputs produce what particular outputs. Program design tends to be based on conjecture and individual experience. There is no systematic body of pertinent knowledge.

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*See Appendix I for an example of how complex federal assistance programs to states and localities can become.

- Different perceptions of federal/nonfederal relationships, the respective roles of grantors and grantees, exist. The uncertainty of who is responsible for what ends in confusion and conflict which is detrimental to the achievement of program objectives.

- Extensive similarities and differences in the implementation of diverse assistance programs exist. The nature of and the reasons for these similarities and differences and their relative costs, benefits, advantages, and disadvantages to various parties have not been systematically analyzed and are not well understood. The assumed values of uniformity and diversity are largely conjectural and are based more on folklore and belief than analysis and comparison.

One operational case study (11) of a federal education program - an evaluation of Part D of the Vocational Education Act Amendments of 1968 - concluded:

> In general, neither the federally sponsored activities nor the federally expected student level outcomes of the program occurred at the level planned. While a number of reasons for this are possible, the findings suggest that the most likely are associated with the general lack of a set of clearly defined objectives, definitions and managerial requirements and procedures at both the project level and at the federal level.

A second case study, an examination by Martha Derthick (8) of President Johnson's 1967 proposal to build model communities on surplus, federally-owned land in metropolitan areas, arrived at the same conclusion - the tendency of the federal government to conceive goals in ideal terms. In Derthick's words:

> A final cause of the program's failure....was that federal officials had stated objectives so ambitious that some degree of failure was certain. Striving for the ideal they were sure to fall short. Worse, striving for the ideal made it hard to do anything at all.

As the two preceding examples of other social programs have shown, reform is not assured by the passage of legislation. A study by Jerome

Murphy (31) of Title I of the Elementary and Secondary Education Act (ESEA) restates some of the previously identified problems of implementation and suggests a limited capacity of USOE and state education agency officials to achieve reform goals:

> To blame the problems on timidity, incompetence, or "Selling out" is to beg the question. I have identified a number of contributing causes: the reformers were not the implementers; inadequate staff; a disinclination to monitor; a law and tradition favoring local control; and absence of pressure from the poor. The primary cause, however, is political. The federal system--with its dispersion of power and control--not only permits but encourages the evasion and dilution of federal reform, making it nearly impossible for the federal administrator to impose program priorities; those not diluted by Congressional intervention can be ignored during state and local implementation (14).

This dispersion of power and control make it difficult for a program administrator to impose federal directives that conflict with local priorities and viewpoints. In this context, Morton Grodzin's (15), description of a good federal administrator is useful:

> The dispersion of power compels political activities on the part of the administrator. Without this activity he will have no program to administer. And the political activity of the administrator, like the administrative activity of the legislator, is often turned to representing in national programs the concern of state and local interests, as well as other interest group constituencies... always the administrator must find support from legislators tied closely to state and local constituencies and state and local governments. The administrator at the center cannot succeed in his fundamental political role unless he shares power with these peripheral groups.

As a result, administering change is usually done by incremental, marginal changes and not great leaps forward.

Program Delivery: Policy Recommendations

The examples noted above suggest several points to be kept in mind in designing career education legislation. First, definitions, objectives, and managerial plans need to be clearly specified. Although goals need to be set, they should not be set so high as to exceed governmental capacity to achieve them. Despite many attempts at definition, career education is still regarded as an abstract concept lacking specificity. Although the definition used in Section 406 of the Education Amendments of 1974 was sufficient to establish small demonstration type programs, there is some doubt whether it is sufficient for a larger program. Further legislation will require a more precise definition and expression of the objectives of career education.

Second, to insure the proper expenditure of funds, careful statewide planning and evaluation procedures should be incorporated into the legislation. Although planning and evaluation activities are viewed with cynicism by many*, they can help assure that federal money for career education is spent in a manner consistent with Federal goals. Another way to achieve this goal is to assign career education coordinators at the state and local levels who are responsible for career education activities.

A final possibility is through seminars, meetings, and training programs for state and local administrators, local school board members, guidance counselors, and, of course, teachers. This will provide an orientation for those indirectly involved in the day-to-day administration as well as create

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*The justifications and problems inherent in state planning and evaluation activities are discussed in some detail in Part II.

a group of people supportive of career education with an interest in seeing career education programs continued.*

Federal Funding Arrangements

The most significant questions about a new federal role in career education may well center around the distribution of funds. How the money should be distributed, who should be eligible to receive it, and what types of specific strategies should be incorporated into the legislation are issues with significant implications for the final form of career education programs.

We begin with the assumption that federal funds should be distributed to state education agencies, be matched dollar for dollar by the states, and then be reallocated within broad programmatic areas specified by federal guidelines. This procedure would utilize existing channels, insure that federal funds will act as a lever to generate state activity and interest, and allow states considerable freedom in determining their career education priorities.

Although federal funds will, of course, be distributed to local education agencies, other public bodies and private groups should be eligible to receive funds. Encouraging the participation of groups outside the strict confines of education is desirable in light of career education's primary objective to bring the worlds of work and education closer together.

*This practice is often referred to less flatteringly as "buying people." In a recent article, David Stockman (38) suggests that there is a trade-off involved in cases such as this. The goals of career education are laudable and the need for individuals personally committed to help implement the program can easily be documented. Like most organizations, however, such groups tend to become self-perpetuating and resist any changes. Citing the Federal experience with Impact Aid and Hills-Burton, Stockman suggests that the creation of social program interest groups should be permitted after only the most careful consideration of the possible consequences.

Moreover, the favorable early evaluations of NIE's "Experience - based" career education programs suggest that groups outside of education can and do provide meaningful educational programs.

As indicated above, a grant program is desireable in expanding federal interest in career education. However, the exact type of grant needs to be more clearly specified.

Categorical vs. Block Grants: Two basic types of federal funding arrangements are categorical and block grants (35). Categorical grants are used, for the most part, for narrowly defined purposes, allowing little room for discretion on the part of a recipient government. Block grants, on the other hand, while tied to a general area, are broader in scope and do not specify the exact objects of permitted expenditure and hence create much larger zones of discretion for the receiving government or agency. In career education, block grants could be put together by combining many of the existing authorizations into a single program.

Although there is widespread federal interest in moving toward block grants to permit greater state and local discretion, they may be inappropriate for use in career education. Given the abstract nature of career education in the eyes of most state and local officials, it is important that the money be targeted for specific purposes rather than just given to the states for them to allocate as they see necessary - at least at the present. Maintaining some degree of federal control will help insure that career education objectives are being pursued, that the funds are not being sidetracked into other areas, and that student and

community needs are being met. In the future, when the term career education is established enough to elicit a uniform response, block grants may be more desirable, but for the present some measure of federal oversight is needed.

Formula vs. Project Grants: A second distinction that should be made is between formula and project grants. Formula grants are divided among all eligible recipients on the basis of a common criterion. A project grant, on the other hand, requires specific approval by federal officials of the proposal made by a potential recipient. Rather than continue the project grant method now being used to finance career education projects, efforts should be made to move to a formula grant. Moving in this direction would help establish career education as a national priority and attract more attention from state and local governments, since the need to obtain federal approval would be minimized. However, the grant would be categorical, which means that the states would have to spend the money within carefully defined areas such as leader training or the development of state plans.

This paper, therefore, recommends a categorical grant program awarded to states through a formula based on a percentage of the total population. This would allow the federal government to establish priority objectives, but it would allow the states leeway in choosing which goals to emphasize.

Demonstration and Exemplary Projects: Federal money for career education projects is currently delivered through demonstration and exemplary project grants and research activities funded largely through NIE. A decision must be reached regarding the future role of such demonstration

and exemplary grant programs. Although a case could be made for ending such funding and putting the money into specific program areas, these innovative programs should be continued. Career education is still in its embryonic stages, and innovative programs that explore alternative avenues a meeting career education objectives should be encouraged. In awarding demonstration and research funds, emphasis should be placed on establishing criteria for evaluating program effectiveness. This will enhance the chances of individual program success as well as demonstrate that career education is a "workable" concept with useful benefits to both students and society.

Set-Asides: A final issue relating to funding career education programs involves the incorporation of specific strategies in the legislation, such as set-asides, to insure that the needs of minority groups are considered in program activities. Experience under Part B of the Vocational Education Act suggests that set-asides have been only moderately successful in meeting their objectives*. Although the social needs that set-asides attempt to address are of major importance, it is questionable whether such provisions should be included in any career education put forward this year. Including set-aside provisions would fragment what will undoubtedly be a small amount of money and handicap state and local officials. Provisions to assure that the needs of minorities are being met should unquestionably be included in any legislation, but the inclusion of specific

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*Relying on Office of Education data, the General Accounting Office Report (14) suggested that the set-asides were not receiving high priority by state governments. In fiscal year 1973, 14 states spent less than 15 percent of Part B funds on programs for the disadvantaged while an additional 12 states spent between 15 and 16 percent. A similar situation was reported for handicapped programs. Although states are permitted to spend any fiscal year allotment over a two year period and thus may not be operating illegally, some states are clearly not giving high priority to programs with special needs.

percentage allotment of funds may be best included in future legislation when career education has become more firmly established.

PART II: STATE AND LOCAL ISSUES

Alternative State Roles in Administration

In most states, departments of education serve as leadership force in the development and implementation of local career education programs. One reason for this role is the importance of state vocational education agencies as the primary funding source for career education programs. Such agencies are responsible for the allocation of funds received under Parts C and D of the Vocational Education Amendments of 1968 (PL 90-576). Through these and similar programs state departments of education are able to initiate and influence local career education programs. The specific scope and role of individual departments, however, varies from state-to-state. Some departments assume a positive and aggressive leadership role in fostering the development of specific types of career education programs. Others serve primarily as regulatory and fiscal processing agencies and depend upon local educational agencies to initiate career education programs. Most departments, however, adopt the first role.

Within each state department, a variety of strategies are used to influence development of local career education programs. Techniques to encourage and support local agencies in career education activities

include: specifying goals and objectives, developing and disseminating guidelines for the development and implementation of career education programs, reviewing and approving local programs requiring the expenditure and distribution of state and federal funds, monitoring and evaluating, identifying areas to receive special attention, and providing consultant services to local school districts. In short, there are numerous opportunities for state involvement and influence in developing and implementing career education programs.

As previously noted, state vocational education agencies have played an active role in promoting the expansion of career education. In some states, they have become the unit responsible for the administration of career education. In other states career education programs are administered through other agencies, such as the offices of pupil services; curriculum; and instruction. Thus the content and administrative nature of career education programs can vary considerably. This diversity, while in many respects desirable, reinforces the need for the establishment of major goals by the federal government.

The implementation of a new career education program will require the identification of new roles within existing state departments of education. Attention should be given to identifying the optimum state-level administrative unit to coordinate a new career education program. Whether an existing unit should be designated or a new one will be created, two key characteristics are important.

First, the administrative unit must have the capacity to implement career education on a kindergarten-through-adult continuum for all segments of the population. Pigeon-holing the unit responsible for

administering career education with an administrative structure bound by grade level or subject matter parameters would stifle the implementation of a comprehensive program.

Second, the administrative unit must be so placed within the state department of education that it can effectively monitor and communicate with all state level agencies involved in education. Since one of the key objectives of career education is the infusion of career education principles and concepts throughout the mainstream of education, it is important that the administrative unit at the state level be in a position to know what is happening in all facets and levels of education.

State Career Education Agency

Both of these characteristics suggest an administrative unit within the state departments of education above the divisional level (third echelon). This would take advantage of the organizational principle that meaningful change usually moves from the top down. Thus, to effect the necessary changes required to implement career education on a statewide basis, the administrative unit must be in a position of authority that will permit it to interact in a catalytic way among present divisions. Relegating state administration of career education to a unit without such administrative power will result in a continuance of more of the same. Although the relocation of the state machinery for dealing with career education will cause anxiety among state department of education staff, in light of the broad based nature of career education and the need for administrative leverage, this paper recommends the establishement of an administrative unit at the assistant commissioner level.

Statewide Director of Career Education

Along with the need to establish the administrative unit described above is the further need for a person to coordinate the operation of the unit. The statewide coordinator of career education will be responsible for shaping and proposing policy relating to the planning, evaluation, and implementation of career education on a statewide basis. In this capacity, the coordinator should work closely with representatives of education and industry throughout the state to facilitate the development of the most effective career education programs.

The Value of Planning and Evaluation

Although state planning and evaluation requirements have been written into much federal legislation in recent years, they are viewed with considerable skepticism in Washington and apprehension in many state capitals. The alternative, however, is no planning, which seems even less attractive.

Planning and evaluation requirements are based on the assumption that articulating goals and objectives and identifying alternative paths will enhance the chances of achieving the desired results. The identification of a causal relationship between plans and outcomes, however, is a difficult, if not impossible, task. Thus to some degree, the cynicism that surrounds state planning and evaluation activities is justified. Changes in the political climate, shifts in state and national priorities, and fluctuations in the economy represent variables over which states have little control. The unpredictable side effects caused by these and other variables often contribute to the "failure"

of even the most carefully drawn plans. As a result, planning and evaluation are often cast in a perjorative context.

Yet such "failures" do not mean that the process itself is worthless. Frequently the activities in the planning and evaluation process are equally and sometimes more important than the outcomes of the planning document itself. Elements of the planning process (such as identifying goals and objectives, identifying resources, establishing linkages between other sectors, and so on) and the unintended side effects (such as the identification of previously untapped resources and the opening of new channels of communication) may be as valuable as the actual planning document. In short, the means may prove more valuable than the end product.*

With the above in mind, this paper recommends that state planning and evaluation activities be required in any Federal career education legislation. Some of the difficulties usually associated with the planning process as well as the lack of precision and newness of career education suggest that the Office of Education should consider providing states with technical assistance in preparing state plans. A continued Federal role through monitoring and auditing state plans may also be useful to assure that states are pursuing career education objectives.

*Two recent examples, in Georgia and Texas, involved activities generated by the planning process that were valuable in their own right although meaningful measurement of their impact is almost impossible. In Georgia, one recent statewide assessment study asked teachers to identify the key goals and objectives in career development programs. In Texas, a statewide study involved a broad spectrum of individuals, both inside and outside of education, in determining state goals and objectives in career education. Both these planning activities involved the participation of a wide spectrum of people. Thus, the planning process served to stimulate interest and informed discussion, provided a variety of viewpoints, and increased support for career education programs.

Characteristics of Planning and Evaluation Activities

The successful implementation of a state plan for career education requires the provision of a continual flow of information for decision making purposes, commonly known as evaluation. Planning and evaluation activities should proceed on a coequal basis. The goals, objectives and alternative paths for their achievement are established through planning, while evaluation identifies the degree that anticipated objectives have been achieved. Divorcing the two would dilute the effectiveness of each.

Evaluation provides information to help conduct periodical review and modification of state plans. State plans should not be cut in stone; they should be flexible enough to be changed to meet new trends and priorities. Similarly, planning should be conducted on a cyclical basis, not as a one-shot project. In light of the "gearing up" approach recommended previously, initial state planning efforts should be prepared for an extended period (i.e. three years) with annual reviews by the federal government. In the future, when career education is more firmly established as a nationwide priority, annual state plans may be desirable.

State plans must not be developed in a vacuum. The identification and active participation of groups not traditionally associated with education should be encouraged. This would expand the bases of career education and increase statewide support. State plans should contain, but not be limited to the following:

- Assessment of existing career education programs and facilities and projection of needs
- Establishment of a comprehensive data base for policymaking, policy analysis, and evaluation purposes

- Identification and description of linkages between education and work within the state and local area
- Development of strategy to infuse implementation of the career education into elementary, secondary, and postsecondary education
- Identification of target populations to be served including alternative program design for special segments of the population such as the educationally disadvantaged and physically and mentally handicapped
- Development of procedures to insure continuous planning and evaluation

Although the broad goals and objectives should be articulated by the federal government, states should have a wide degree of latitude in pursuing them. State planning documents should include guidelines, procedures, and criteria to be used in deciding which projects or programs to fund. The distribution of funds on a categorical-formula basis coupled with the development of specific procedures for distribution and allocation of funds at the state level will increase the likelihood that career education objectives will be pursued and that the funds will not be shunted into other areas.

Determining Eligibility to Receive Funds

Attention must be given to issues of eligibility and distribution of funds since decisions relating to these issues will play a significant role in determining the shape and nature of career education in each state.

Institutions and agencies outside the educational mainstream (such as private industry, trade unions, philanthropic organizations, and

service clubs) should be encouraged to participate in and provide resources for career education programs. To further this objective, eligibility requirements should be flexible enough to stimulate their participation. Two strategies might be used to pursue this goal: first, allocate to specified agencies a set proportion of funds. For example, 10 percent of a state's allotment may be reserved for trade unions. A second approach would encourage states to include in their planning activities ways of identifying the resources other groups can provide and seeking their participation in meeting state objectives.

This paper recommends the adoption of the second strategy, which maximizes the matching of resources with needs and is consistent with federal goals in allowing states flexibility in pursuing their own priorities. The first approach, on the other hand, would divide the funds available and handicap state administrators. The identification of particular groups may also result in the failure to identify all potential contributors.

Leadership at the Local Level

Just as there is a need for a well-placed coordinator of career education at the state level, so there is an equally important need for leadership at the local level. Although most local administrative structures have persons responsible for subject matter areas such as English, history, and mathematics, the placement of a coordinator at that level in the hierarchy might jeopartize the implementation of a comprehensive program. Since career education involves both the worlds of work and education, the ideal location for a local coordinator of career education would be in a position to influence the key educational

people at the local level. In light of the persuasive role of the local coordinator and the potential impact this role has on influencing the total educational system, a local coordinator should be appointed at a high administrative level.

The local coordinator of career education will be responsible for ultimately implementing a comprehensive career education program for kindergarten through adult. The coordinator will participate in the shaping of local educational policy for career education, provide in-service training for individuals, and coordinate the integration of career education concepts across and between grade levels and among subject matter areas. Responsibilities should also include keeping the state coordinator informed about local activities, providing the state with the necessary fiscal and student data required for state and federal-level reporting, and securing funds for local career education activities. Since many districts will be moving in the direction of career education for the first time, a local coordinator may require extensive in-service training at the intended level of efficiency and effort.

SUMMARY

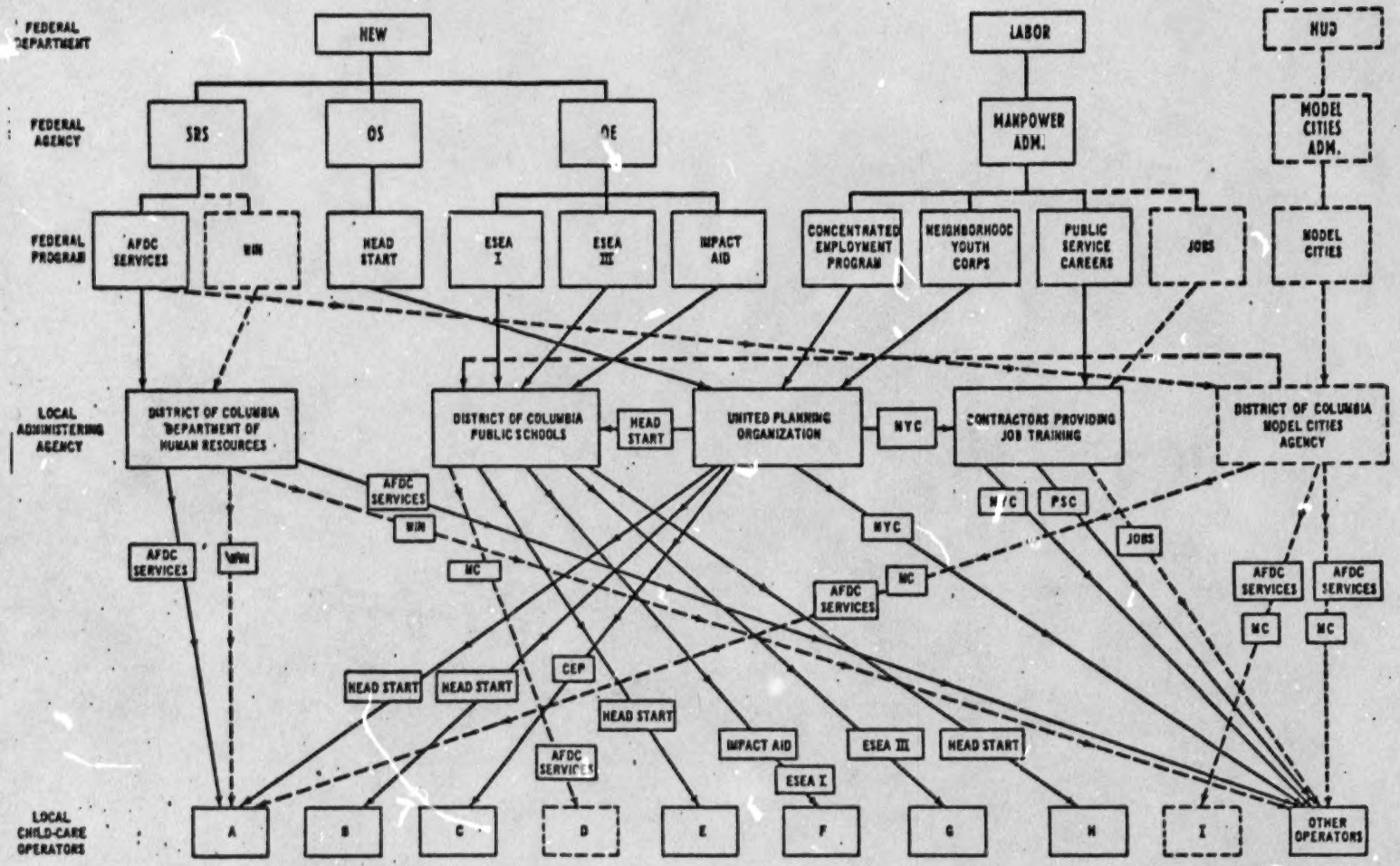
Beginning with the premise that program implementation is largely a political process with substantial implications for the final shape of a program or policy, this paper identified key administrative issues that need to be addressed before new career education legislation is proposed. Organizational issues, legislative requirements and restrictions, planning of evaluation activities and funding arrangements were discussed in some detail, and policy recommendations were advanced. Rather than

advocating a specific position, however, the preceeding discussions and recommendations was intended to point up key issues at the federal, state and local level and provide some background for discussion between participants in the policymaking process.

APPENDIX I

This chart, taken from the recent GAO report (14), illustrates how complex programs of federal aid can become.

CHILD-CARE ACTIVITIES IN THE DISTRICT OF COLUMBIA



REFERENCES

1. Barlow, Melvin L. "Proposals for Career Education Legislation." A Discussion paper prepared for the National Advisory Council on Career Education, September 1975.

2. Berke, Joel S. Answers to Inequity: An Analysis of the New School Finance. Berkeley: McCutchan Publishing, 1974.

3. Berke, Joel S. and Hartle, Terry W. "Key Concepts in Career Education: Legislative and Policy Issues." A paper prepared for the National Advisory Council on Career Education, July 1975.

4. Blechman, Barry, Cramlich, Edward and Hartman, Robert. Setting National Priorities: The 1976 Budget. Washington: Brookings Institution, 1975.

5. Commission on Government Procurement. "Report of the Commission on Government Procurement." 4 Vols. Washington: U. S. Government Printing Office, 1972.

6. Conant, James B. Slums and Suburbs: A Commentary on Schools in Metropolitan Areas. New York: McGraw Hill, 1961.

7. Christoffel, Pamela. "Federal Vocational Education Programs: An Analysis of Legislative Issues and Proposals." An unpublished draft prepared for the College Entrance Examination Board, Washington, D. C., August 1975.

8. Derthick, Martha. New Towns In-Town. Washington: Urban Institute, 1972.

9. Derthick, Martha. Uncontrollable Spending For Social Services Grants. Washington: Brookings Institution, 1975.

10. Department of Health, Education and Welfare. An Introduction to Career Education: A Policy paper of the United States Office of Education." (OE) 75-00504. Washington: U.S. Government Printing Office, 1975.

11. Development Associates, Inc. Evaluation of Vocational Exemplary Projects, Part D, Vocational Education Act Amendments of 1968. Performed under OE contract OEC-0-73-6663, March 1975.

12. Education Funding News. "Congress to Act on Major Education Bills." May 30, 1975.

13. Government Accounting Office. "Fundamental Changes are Needed." A report to Congress. GGD-75-75, August 1975.

14. Government Accounting Office. "What is the Role of Federal Assistance for Vocational Education?" A report to Congress. B-164031, December 1974.

15. Grodzin, Morton. The American System: A New View of Government in the United States. Chicago: Rand McNally and Company, 1966.

16. Grubb, W. Norton and Lazerson, Marvin. "Vocational Education in American Schooling: Historical Perspective." Inequality in Education. 16:5-16.

17. Herr, Edwin L. and Cramer, Stanley, N. Conditions in Education Calling for Reform: An Analysis (Monographs on Career Education) Washington: U.S. Government Printing Office, 1975.

18. Honey, John C. and Hartle, Terry W. "A Career Education Entitlement Plan: Administrative and Political Issues." Syracuse University Research Corporation. Prepared under contract with the National Institute of Education, April 1975.

19. Honey, John C. and Hartle, Terry W. Federal-State-Institutional Relations in Postsecondary Education. Prepared under DHEW contract OEC-0-72-5017, February 1975.

20. House Committee on Education and Labor and Senate Committee on Labor and Public Welfare. A Compilation of Federal Education Laws. Washington: U.S. Government Printing Office, February 1975.

21. "How States and Localities Spend Money" National Journal Reports. 7: 284-285.

22. Hoyt, Kenneth. "Career Education and Counselor Education." Remarks prepared for presentation at the Association for Counselor Education and Supervision meeting, APGA Convention. New York City. March 1975.

23. Hoyt, Kenneth. "Career Education: What's Doable Now?" Remarks prepared for presentation to the Sacramento Career Education Conference. Sacramento, California, August 1975.

24. Hoyt, Kenneth. "Evaluation of Career Education: Implications for Instruction at the Elementary School Level." Journal of Career Education, Spring 1975.

25. Hoyt, Kenneth. "The Linkage of Education with the World of Work and Career Development." Remarks prepared for the Governor's Conference on Human Resources Development. Austin, Texas, November 1974.

26. Kaufman, Jacob J. "Career Education: A New Approach." Inequality in Education. 16:42-46

27. Law, Gordon. "Strategies for Change Through Career Education." Inequality in Education. 16:37-41.

28. Marland, Sidney P. Career Education: A Proposal for Reform. New York: McGraw Hill, 1974.

29. Marland, Sidney P. "Career Education Now." Address given at the convention of the National Association of Secondary School Principals, January 1971.

30. Matthews, John. "Consensus Emerges on the Federal Role in Education." New York Times. January 15, 1975.

31. Murphy, Jerome. "Title I of ESEA: The Politics of Implementing Federal Education Reform." Harvard Educational Review 41: 35-63

32. National Commission on the Financing of Postsecondary Education. Financing Postsecondary Education in the United States. Washington: U. S. Government Printing Office, 1973.

33. Newton, Robert. "Towards an Understanding of Federal Assistance." Public Administration Review, 35:372-378.

34. Office of Career Education. Career Education Programs and Progress. A report on U.S. Office of Education Activities in Career Education in Fiscal Year 1973, April 1974.

35. Pressman, Jeffrey and Wildavsky, Aaron. Implementation. Berkeley: University of California Press, 1973.

36. Reagan, Michael. The New Federalism. New York: Oxford University Press, 1972.

37. Reubens, Beatrice. "Vocational Education: Performance and Potential. Manpower, July 1974.

38. Stockman, D. "The Social Pork Barrel." The Public Interest. 39: 3-30.

39. U. S. Department of Labor. "American Manpower Today." Washington: U. S. Government Printing Office, 1974.